

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO
LAS CRUCES DIVISION

**SANJUANA QUIROZ, Individually and on
Behalf of All Others Similarly Situated**

PLAINTIFF

vs.

No. 2:21-cv-1197-KRS-DLM

DCT ENTERPRISES OF NEW MEXICO, LLC

DEFENDANT

MOTION TO ALLOW FOR ATTENDANCE VIA ZOOM VIDEOCONFERENCE

Plaintiff Sanjuana Quiroz ("Plaintiff"), by and through her attorney Josh Sanford of Sanford Law Firm, PLLC, and for her Motion to Allow for Attendance via Zoom Videoconference, does hereby state and allege as follows:

1. On September 26, 2023, the Court set a hearing on Plaintiff's Second Motion for Default Judgment for October 11 at 1:30 PM in the Guadalupe Courtroom at the United States Courthouse, 100 N. Church Street, Las Cruces, NM. See ECF No. 22.

2. While Plaintiff's counsel understands the importance of face-to-face discussion with the Court, Plaintiff's counsel will be in Nevada meeting prior commitments during the date of the hearing.

3. In addition, Plaintiff has injuries from a past car accident that require physical therapy and which make it difficult to travel.

4. Accordingly, Plaintiff requests permission to attend the October 11 Motion hearing via Zoom videoconference.

5. Plaintiff's counsel does not believe this will, in any way, alter the ability to have a thorough, detailed, and meaningful Motion Hearing.

6. Rather, a remote hearing allows Plaintiff to further keep costs to a minimum in order to help facilitate proceedings.

7. This request is made for good cause and not for delay.

WHEREFORE, premises considered, Plaintiff Sanjuana Quiroz requests this Court grant her Motion to Allow for Attendance Via Zoom Videoconference during the hearing on Plaintiff's Second Motion for Default Judgment on October 11, 2023.

Respectfully submitted,

**SANJUANA QUIROZ, Individually
and on Behalf of All Others
Similarly Situated, PLAINTIFF**

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